

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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PABLO BRUM, BRIANNA BULSKI, KJERSTI FARET, SARA M. LYONS, MARISA RAVEL, AND KATIE THIERJUNG	:	
	:	Case No.: 1:18-cv-05399-JMF-KNF
	:	
Plaintiffs,	:	
v.	:	
	:	
PARAGON DESIGN CORP, STEVEN MADDEN, LTD., AND ZULILY LLC,	:	
	:	
Defendants.	:	
	:	

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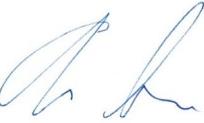
**PLAINTIFFS' MOTION TO ENFORCE SETTLEMENT AGREEMENT**

Plaintiffs Pablo Brum, Brianna Bulski, Kjersti Faret, Sara M. Lyons, Marisa Ravel, and Katie Thierjung (“Plaintiffs”) hereby move to enforce the settlement agreement that was reached at the October 24, 2018 settlement conference before Judge Fox (the “Settlement Conference”). As addressed in the Memorandum of Law and Declaration filed in support of the instant motion, Plaintiffs and Defendant Paragon Design Corp. (“Paragon”) not only reached an agreement on the material settlement terms at the Settlement Conference, they read the material settlement terms into the record in open Court and the settlement was confirmed by the Court in a later docket entry.

Paragon is now refusing to honor the terms of settlement and have forced Plaintiffs to file the instant motion. Plaintiffs respectfully request that the Court enforce the settlement agreement and grant Plaintiffs their attorneys’ fees and costs incurred in bringing this motion as well as interest on the Thirty-Five Thousand Dollar (\$35,000) settlement as to Paragon, as well as whatever additional relief the Court deem just and proper.

Dated: New York, New York  
October 30, 2018

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